

**Harter Secrest & Emery LLP**

ATTORNEYS AND COUNSELORS

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April 29, 2015

VIA FACSIMILE (973-776-7865)

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

RE: Suzanne Caruso v. Joseph Occhiogrosso, et al.
No.: 2:11-cv-01951

Dear Judge Waldor:

As you know, Harter Secrest & Emery LLP is co-counsel to Plaintiff Suzanne Caruso in the above-referenced action. Pursuant to the Court's text order entered on January 9, 2015, the deadline for fact discovery is currently April 30, 2015. With the assistance of Your Honor, the parties have been working amicably in an attempt to resolve several discovery disputes. Because certain issues remain open and because the parties have not yet been able to conduct any depositions, we hereby request that the deadline for the close of fact discovery be extended ninety (90) days. Defendant Occhiogrosso's counsel, Joseph Haftek, Esq., has consented to this request.

Thank you for your consideration.

Yours truly,

HARTER, SECREST & EMERY LLP

John G. Horn
Partner

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SO ORDEREDs/Cathy L. WaldorCathy L. Waldor, U.S.M.J.

Date: 5/5/15

JGH/tlk

cc: Joseph Deer, Esq. (via email)
Joseph R. Haftek, Jr., Esq. (via email)